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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ROBERT DE VITO, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

LIQUID HOLDINGS GROUP, INC.,
BRIAN M. STORMS, KENNETH D.
SHIFRIN, RICHARD SCHAEFFER,
BRAIN FERDINAND, and SANDLER
O'NEILL & PARTNERS, L.P.,

Defendants.

Civ. No.: 15-6969 (KM) (JBC)

CLASS ACTION

**LEAD PLAINTIFFS' NOTICE OF
MOTION FOR: (I) AN AWARD OF
ATTORNEYS' FEES AND
REIMBURSEMENT OF
LITIGATION EXPENSES; AND (II)
INCENTIVE AWARDS TO
PLAINTIFFS**

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that on January 10, 2020 at 10:00 a.m., or as soon thereafter as counsel may be heard, Lead Plaintiffs Michael Sanders and Sidney R. Berger (collectively, "Lead Plaintiffs") will move before the Honorable Kevin

McNulty, U.S.D.J. at the United States Post Office and Courthouse Building, Newark, New Jersey, for an Order: (i) awarding attorneys' fees of one-third of the Settlement Fund; (ii) awarding payment of litigation expenses; and (iii) granting Lead Plaintiffs' request for an incentive award pursuant to the Private Securities Litigation Reform Act of 1995.

Lead Plaintiffs intend to rely upon the annexed Brief in Support of Co-Lead Counsel's Motion for an Award of Attorneys' Fees and Payment of Litigation Expenses, the Supplemental Declaration of Adam M. Apton, the Declaration of S. Douglas Bunch, the Declaration of Michael Sanders, the Declaration of Sidney R. Berger and the Declaration of Sarah Evans. Lead Plaintiffs also refer to and rely upon the Declaration of Adam M. Apton submitted in support of Lead Plaintiffs' Motion for Preliminary Approval.

Lead Plaintiffs have also submitted a Proposed Order in connection with their motion.

Dated: December 6, 2019

Respectfully submitted,

LEVI & KORSINSKY, LLP

/s/ Eduard Korsinsky

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